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August 7, 2024

VIA ECF

The Honorable Dale E. Ho
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: Doe v. Columbia University, No. 23-cv-10393-DEH; *Doe v. Hunter*, No. 23-cv-10394-DEH (related); *Doe v. Kachalia*, No. 23-cv-10395-DEH (related)

Dear Judge Ho:

On behalf of Defendant Trustees of Columbia University in the City of New York (“Columbia”), and in accordance with the Court’s August 1, 2024 Order in the above-captioned action, ECF 36 (“Order”), we respectfully submit redacted versions of ECF 24 and ECF 25 as exhibits to this letter.

Consistent with the Court’s Order, the submitted redactions are narrowly tailored to address only the contents of the parties’ settlement agreement and the identity of a non-party former student. See ECF 36 at 6. For the Court’s and Plaintiff’s convenience, we are also filing under seal unredacted versions that have been highlighted to reflect the redactions. Columbia is sending to Plaintiff copies of this letter, both versions of ECF 24 and ECF 25 showing the redactions, and the Court’s Order via Priority Express mail and email, and will promptly file proof of such service on the docket.¹

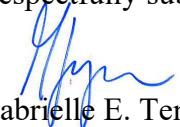
Columbia respectfully maintains that the names of non-party former students in Plaintiff’s complaint in this action should be similarly redacted and/or pseudonymized consistent with the Court’s Order and with the redactions made in the prior action filed by Plaintiff using a virtually identical complaint. See ECF 29 & 36; *Doe v. Columbia*, No. 19-cv-11328 (S.D.N.Y.), ECF 21 & 24. If the Court so directs, Columbia is prepared to submit to the Court a redacted and pseudonymized version of the complaint in this action, using the same procedure as was employed here.

¹ USPS Priority Express mail provides an expected delivery date of August 8, 2024, and no other overnight delivery service is available to deliver to Plaintiff’s service address, which is a P.O. Box.

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Respectfully submitted,


Gabrielle E. Tenzer

cc: Plaintiff John Doe (via Priority Express mail & email)